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Attorneys for Defendants J.C. Penney Corporation, Inc.
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STEPHANIE GARRIDO and JAZMIN
SOLANO, as aggrieved employees
pursuant to the Private Attorneys General
Act ("PAGA"),

Plaintiffs,

vs.

J.C. PENNEY CORPORATION, INC.,
a Delaware corporation; J.C. PENNEY
COMPANY, INC., a Delaware
corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 5:18-cv-02051-JVS-SP

**JOINT STIPULATION RE
[PROPOSED] JUDGMENT**

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1 On January 25, 2019, the Court granted Plaintiffs' Motion for Approval of
2 Settlement. Dkt. No. 16. In accordance with the parties' Settlement Agreement, the
3 parties hereby stipulate to and now jointly request an order for final judgment,
4 substantially in the form attached hereto, that will dismiss the case in accordance with
5 the parties' Settlement Agreement and the Court's January 25, 2019 Order.

6 **IT IS SO STIPULATED.**

7
8 Dated: January 29, 2019

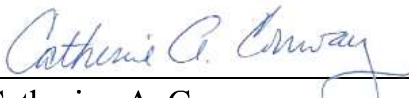
Respectfully submitted,

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9
10 By: 
11 Raul Perez
12 Robert J. Drexler, Jr.
13 Molly Ann DeSario
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15 Dated: January 29, 2019

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Case No. 5:18-cv-02051-JVS-SP

[PROPOSED] JUDGMENT

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and J.C. Penney Company, Inc.

JUDGMENT

1
2 1. Judgment in this matter is entered in accordance with the terms of the
3 Order Granting Plaintiffs' Motion for Approval of Settlement (the "Order") (Dkt. 16)
4 and the parties' PAGA Settlement Agreement ("Settlement Agreement") (Dkt. 11-1, Ex.
5 1).

6 2. Pursuant to the terms of the Settlement Agreement, Plaintiffs' proposed
7 class action claims (i.e., Plaintiffs' First, Second, and Third causes of action), are
8 dismissed WITHOUT PREJUDICE.

9 3. In all other respects, this Action is hereby dismissed WITH PREJUDICE.

10 4. Pursuant to the terms of the Settlement Agreement, the Plaintiffs, all
11 Aggrieved Employees, and the State of California waive and forever discharge the
12 Released Parties from the Released Claims, as defined in the Settlement Agreement. *See*
13 *Arias v. Superior Court*, 46 Cal. 4th 969, 986 (2009).

14 5. This Judgment shall be binding on the Plaintiffs, all Aggrieved Employees,
15 and the State of California.

16 6. Neither this Judgment, the Settlement Agreement, any document referred
17 to herein, any exhibit to any document referred to herein, any action taken to carry out
18 the settlement, nor any negotiations or proceedings related to the settlement are to be
19 construed as, or deemed to be evidence of, or an admission or concession with regard to,
20 the denials or defenses of Defendant (or any settling party), and shall not be offered in
21 evidence in any proceeding against the parties hereto in any Court, administrative
22 agency, or other tribunal for any purpose whatsoever other than to enforce the provisions
23 of this Order and Judgment.

24 7. Without affecting the finality of the Judgment, the Court shall retain
25 exclusive and continuing jurisdiction over the above-captioned action and the parties for
26 purposes of enforcing the terms of the Settlement Agreement.

1 8. Except as otherwise provided by the Settlement Agreement, each side shall
2 bear their own attorneys' fees and costs.

3
4 **IT IS SO ORDERED, ADJUDGED, AND DECREED.**

5
6 Date _____

Hon. James V. Selna
United States District Judge